

# **EXHIBIT 2**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
)  
WAYMO LLC, )  
)  
Plaintiff, )  
)  
vs. ) Case No.  
) 3:17-cv-00939-WHA  
UBER TECHNOLOGIES, INC., )  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
)  
Defendants. )  
\_\_\_\_\_)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF GARY T. BROWN  
San Francisco, California  
Friday, March 24, 2017  
Volume I

Reported by: SUZANNE F. GUDELJ  
CSR No. 5111  
Job No. 2577644  
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1           A     When activity occurs on devices that are on  
2     Google's corporate network, our sensors pick up  
3     information about that traffic, and those go into  
4     our logs.

5           Q     So what information was picked up about the 12:18:18  
6     downloading of the 14,000 files?

7           A     From the network traffic. Approximately 10  
8     gigabytes of data was transferred from the IP  
9     address and domain where the subversion server  
10    relies -- resides to the work laptop of Anthony 12:18:46  
11    Levandowski.

12          Q     Did you consider that to be suspicious?

13               MR. HOLMES: Objection to form.

14               THE WITNESS: Potentially.

15    BY MR. GONZALEZ: 12:19:04

16          Q     That fact by itself didn't make you to  
17     think -- didn't make you think that he had done  
18     anything improper, did it?

19               MR. HOLMES: Objection to form.

20               THE WITNESS: That fact by itself has other 12:19:15  
21     factors around it that do make it suspicious.

22    BY MR. GONZALEZ:

23          Q     Such as?

24          A     Such as the searching for instructions on  
25     how to access that server; such as the appearance of 12:19:27

1 a USB device in the device the files were downloaded  
2 to followed by the obliteration of that device and  
3 its reformat into a completely unexpected operating  
4 system.

5 Q All right. Let me take those pieces at a 12:20:00  
6 time. When did you get the information on  
7 instruction searches for how to access that server?

8 A I'm sorry, can you repeat that?

9 Q Yes. You said that other facts might  
10 indicate suspicion, and you said that he had 12:20:20  
11 searched for instructions on how to access the  
12 server. When did you learn that he had done such a  
13 search?

14 A I'm unsure.

15 Q Was it before October of 2016? 12:20:38

16 A I don't believe so.

17 Q When did you first learn of the appearance  
18 of a USB device?

19 A Can you be more specific?

20 Q You referenced the "appearance of a USB 12:21:04  
21 device in the device the files were downloaded to."  
22 When did you learn that?

23 A Sometime in February 2017.

24 Q Then you said "followed by the obliteration  
25 of that device." When did you learn that? 12:21:23